

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**CASE NO.: 03-CR-10331 (RGS)**

**vs.**

**IVAN VELEZ,**

**Defendant.**

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**AGREED MOTION TO MODIFY/CLARIFY CONDITIONS OF PROBATION**

COMES NOW the Defendant, Ivan Velez, by and through undersigned counsel, and files this his Motion to Modify/Clarify Conditions of Probation, and, as good grounds, states as follows:

1. The Defendant's wife, Ana Maria Echeverri, is the sole owner and president of a freight forwarding company in Miami, Florida, General Express & Services, Corp., that transfers primarily bulk merchandise abroad. The business address is 8326 N. W. 68<sup>th</sup> Street, Miami, FL 33166, but anticipates moving shortly to a smaller locale due to slowing business. The Defendant's wife and General Express have not been indicted for any federal or state offenses despite having been audited by the IRS and the agents in the instant case.

2. The Defendant is now living in a halfway house and is due to go home in a few days. He is working with a freight forwarding company in the Miami area, ARC Worldwide Express and Cargo, which is a direct business competitor of General Express & Services, Corp. He has not been allowed by his probation officer, Viviana Bibliowicz, to return to his family business General Express & Services, Corp. or otherwise work with his wife. However, there was no

requirement by this Court that Defendant not be employed at General Express, as the officer alleges, because several phone calls and e-mails were made from the General Express office during the money laundering conspiracy where Defendant delivered, on a single occasion, less than \$90,000 to co-defendant Patino in Defendant's then Doral, Florida home.

3. The Defendant is desirous of working at General Express & Services, Corp. and assisting his wife in the family business or any other legitimate business venture. He has been employed since his release from prison, and has otherwise been an exemplary probationer. Additionally, the Defendant is a U.S. Citizen, has no prior criminal history other than the present case, and he and his wife both have business degrees.

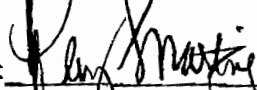
4. AUSA James Lang has no objections to the motion.

**WHEREFORE** the defendant prays this Honorable Court allow the Defendant to work at General Express & Services, Corp.

**DATED** this 27th day of March 2008.

Respectfully submitted,

**PERCY MARTINEZ, P.A.**  
Attorneys for the Defendant VELEZ  
2 Alhambra Plaza, Suite 112  
Coral Gables, Florida 33134  
Telephone: (305) 529-0001  
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By:   
**Percy Martinez, Esq.**  
**FL Bar No: 981990**

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LAW OFFICE

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing motion was mailed/faxed to James Lang, Assistant United States Attorney at the Office of the United States Attorney, Boston, Massachusetts and to Viviana Bibliowicz, United States Probation Officer at 14601 Oak Lane, Miami Lakes, FL 33016 on this 27th day of March 2008.

By: Percy Martinez, Esq.

**UNITED STATES DISTRICT COURT  
MASSACHUSETTS DIVISION**

**UNITED STATES OF AMERICA,**

**V.**

**CRIMINAL NO.: 03-CR-10331 (RGS)**

**IVAN VELEZ,**

\_\_\_\_\_ /

**ORDER GRANTING AGREED MOTION TO MODIFY/CLARIFY  
CONDITIONS OF PROBATION**

**THIS CAUSE** came to be heard this upon Defendant's Agreed Motion to Modify/Clarify Conditions of Probation.

It is hereby

**ORDERED AND ADJUDGED** that said motion is **GRANTED**, and the defendant, Ivan Velez, shall be permitted to be employed at his family business, General Express & Services, Corp. and, moreover, shall be permitted to otherwise be employed with his wife, Ana Maria Echeverri in any other legitimate business concern.

All other conditions of probation shall remain the same.

**DONE AND ORDERED** this \_\_\_\_ day of April 2007.

\_\_\_\_\_  
**Richard G. Stearns**  
United States District Judge

cc: James Lang, AUSA  
Percy Martinez, Esq.  
Viviana Bibliowicz, USPO

**PERCY MARTINEZ, P.A.**  
**Attorneys and Counselors at Law**  
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**TO: Honorable Judge Richard G Stearns**

**BUSINESS NUMBER: (617)748-9112**

**FACSIMILE NUMBER:(617)748-9096**

**REFERENCE: Ivan Velez**

**FROM: Percy Martinez**

**DATE: March 27, 2008**

**Number of Pages, Including This Page: 4**

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